

STATEMENT OF BASIS (AI No. 161965)

for draft Louisiana Pollutant Discharge Elimination System permit No. LA0124443 to discharge to waters of the State of Louisiana.

THE APPLICANT IS: Turn Services, LLC
2200 Royal Street
New Orleans, LA 70117

ISSUING OFFICE: Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services
Post Office Box 4313
Baton Rouge, Louisiana 70821-4313

PREPARED BY: Ronda Burtch

DATE PREPARED: February 5, 2009

1. PERMIT STATUS**A. Reason For Permit Action:**

Issuance of a Louisiana Pollutant Discharge Elimination System (LPDES) permit for a 5-year term.

B. Date Application Received: November 17, 2008

2. FACILITY INFORMATION

A. FACILITY TYPE/ACTIVITY - This facility performs barge cleaning and minor barge repairs. Barges are dry cleaned by blade and shovel at area facilities before arrival at the washing site. Barges are then washed with river water by means of pumps. After washing, water that remains in the cargo holds is removed by pumps and discharged back into the river at the point of intake. This facility does minor repair of 50% of barges washed. Repairs consist of fiberglass repairs to covers and minor welding on deck or in the cargo hold. No repair work is performed below the waterline.

B. FEE RATE

1. Fee Rating Facility Type: Minor
2. Complexity Type: II
3. Wastewater Type: II
4. SIC code: 4491

C. LOCATION - Mile marker 86, West Bank of the Mississippi River, off Patterson Street in Algiers, Orleans Parish

Latitude 29° 55' 03", Longitude 89° 55' 35"

3. OUTFALL INFORMATIONOutfall 001

Discharge Type: dry commodity barge / vessel washwater

Treatment: none

Location: at the point of discharge from the barge / vessel being washed

Statement of Basis for
Turn Services, LLC,
LA0124443, AI No. 161965
Page 2

Flow: intermittent
Discharge Route: directly into the Mississippi River

Outfall 002

Discharge Type: coal and coke barge / vessel washwater
Treatment: none
Location: at the point of discharge from the barge / vessel being washed
Flow: intermittent
Discharge Route: directly into the Mississippi River

Outfall 03A

Discharge Type: incoming ballast and void tank water from customer barges
Treatment: none
Location: at the point of discharge from the customer barge wing/void tanks
Flow: intermittent
Discharge Route: directly into the Mississippi River

Outfall 03B

Discharge Type: maintenance and dry dock ballast water and void tank water
Treatment: none
Location: at the point of discharge from the work barge wing/void tanks
Flow: intermittent
Discharge Route: directly into the Mississippi River

4. RECEIVING WATERS

STREAM - Mississippi River

BASIN AND SEGMENT - Mississippi River Basin, Segment 070301

DESIGNATED USES -

- a. primary contact recreation
- b. secondary contact recreation
- c. propagation of fish and wildlife
- d. drinking water supply

5. TMDL STATUS

The discharges from Turn Services, LLC are directly into the Mississippi River, Subsegment 070301 of the Mississippi River Basin. Subsegment 070301 is not listed on LDEQ's Final 2006 303(d) List as impaired, and to date no TMDL's have been established. A reopener clause will be established in the permit to allow for the requirement of more stringent effluent limitations and requirements as imposed by any future TMDLs.

6. PROPOSED EFFLUENT LIMITS

BASIS - See Rationale below.

Statement of Basis for
Turn Services, LLC,
LA0124443, AI No. 161965
Page 3

7. COMPLIANCE HISTORY/COMMENTS

1. OEC – There is no OEC compliance history on file as of January 14, 2009.
2. DMR Review/Excursions – Since this is a new facility, there are no DMRs on file as January 14, 2009.

9. ENDANGERED SPECIES

The receiving waterbody, Subsegment 070301 of the Mississippi River Basin, has been identified by the U.S. Fish and Wildlife Service (FWS) as habitat for the Pallid Sturgeon, which is listed as an endangered species. LDEQ has not submitted this draft permit to the FWS for review in accordance with a letter dated November 17, 2008 from Rieck (FWS) to Nolan (LDEQ). As set forth in the Memorandum of Understanding between the LDEQ and the FWS, and based on information provided by the FWS, LDEQ has determined that the issuance of the LPDES permit is not likely to have an adverse effect upon the Pallid Sturgeon. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat. Therefore, the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat.

10. HISTORIC SITES

The discharge will be from a proposed facility. However, since this is a floating barge facility with only water based operations, the State Historic Preservation Officer (SHPO) requirement is not applicable.

11. TENTATIVE DETERMINATION

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to issue a permit for the discharge described in the application.

12. PUBLIC NOTICES

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List

Statement of Basis for
Turn Services, LLC,
LA0124443, AI No. 161965
Page 4

Rationale for Turn Services, LLC

1. **Outfall 001:** dry commodity barge / vessel washwater

Based on BPJ and on permits for similar facilities, no effluent limitations are established for washwaters from barges previously containing dry commodities including: calcine coke, grain, grain products, gypsum, limestone rock, steam coal, bulk cement, iron ore, limonite, urea, and hematite. Best Management Practices (BMPs) for barge operations are listed in Part II.

2. **Outfall 002:** coal and coke barge / vessel washwater

Pollutant	Limitation		Reference
	Monthly Avg	Daily Max	
	mg/L		
Flow	Report	Report	LAC 33:IX.2701.1.1.b
COD	250	400	Similar discharges (BPJ)
TSS	Report	Report	Similar discharges (BPJ)
pH, sun.	6.0 (min)	9.0 (max)	Similar discharges (BPJ)

BPJ Best Professional Judgment

Treatment: none

Monitoring Frequency: TSS shall be observed once per month and Flow, COD and pH shall be observed once per week at the point of discharge from the barge /vessel being washed.

Limits Justification: Limits and Monitoring Frequency are based on current guidance for similar discharges from other industrial facilities.

3. **Outfall 03A:** incoming ballast and void tank water from customer barges

Outfall 03B: maintenance and dry dock ballast water and void tank water

Pollutant	Limitation		Reference
	Monthly Avg	Daily Max	
	mg/L		
Flow	Report	Report	
COD	---	250	Similar discharges (BPJ)
Oil & Grease	---	15	Similar discharges (BPJ)
pH, sun.	6.0 (min)	9.0 (max)	Similar discharges (BPJ)

BPJ Best Professional Judgment

Treatment: none

Monitoring Frequency: Flow, COD, Oil & Grease and pH shall be observed once per week at the point of discharge from the customer barge/vessel wing/void tanks.

The measurement frequency for Outfall 03B for the discharge of maintenance ballast and void water shall be 1/month whenever sampling is required at the point of discharge from the work barge wing/void tanks.

Statement of Basis for
Turn Services, LLC,
LA0124443, AI No. 161965
Page 5

Limits Justification: Limits and Monitoring Frequency are based on current guidance for similar discharges from other industrial facilities.

This facility is not subject to Effluent Limitations Guidelines for Transportation Equipment Cleaning, 40 CFR Part 442, because, in accordance with 40 CFR 442.1.a, "this part applies to discharges resulting from cleaning the interior of tanks used to transport chemical, petroleum or food grade cargos." This facility cleans barges and vessels containing dry commodities only. This facility does not clean barges and vessels containing chemical, petroleum or food grade cargos as defined in 40 CFR 442.

STORM WATER POLLUTION PREVENTION PLAN (SWP3) REQUIREMENT

A SWP3 is included in the permit because in accordance with LAC 33:IX.2511.A.1, storm water discharges shall not be required to obtain an LPDES permit "... except... discharges associated with industrial activity." In accordance with LAC 33:IX.2511.B.14.a-k, facilities classified as SIC code 4491 are considered to have storm water discharges associated with industrial activity. In addition to the SWP3, the barge BMPs will be applied because barge BMPs are comparable to the SWP3 requirements.

For first time permit issuance, the SWP3 shall be prepared, implemented, and maintained within six (6) months of the effective date of the final permit. **For renewal permit issuance**, the SWP3 shall be reviewed and updated, if necessary, within six (6) months of the effective date of the final permit. The plan should identify potential sources of storm water pollution and ensure the implementation of practices to prevent and reduce pollutants in storm water discharges associated with industrial activity at the facility (see Part II of the permit).